EXHIBIT C

Vladimir Iakovlev, M.D.

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 1              IN THE UNITED STATES DISTRICT COURT

 2          OF THE SOUTHERN DISTRICT OF WEST VIRGINIA

 3                     CHARLESTON DIVISION

 4    IN RE: ETHICON, INC., PELVIC )

 5    REPAIR SYSTEM PRODUCTS        )   Master File No.

 6    LIABILITY LITIGATION          )   2:12-MD-02327

 7    ----------------------------)   MDL 2327

 8    THIS DOCUMENT RELATES TO THE FOLLOWING

 9    CASES IN WAVE 1 OF MDL 200:

10    MARGARET J. STUBBLEFIELD       )   Civil Action No.

11                       Plaintiff,)   2:12-cv-00842

12    vs.                            )

13    ETHICON, INC., ET AL.          )

14                     Defendant. )

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17    ---   This is the Deposition of VLADIMIR IAKOVLEV, M.D.,

18    taken at The Westin Harbour Castle, 1 Harbour Square,

19    Toronto, Ontario, on the 21st day of March, 2016.

20              REPORTED BY: TERRY WOOD, RPR, CSR

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1   opinions?

2   BY MR. SNOWDEN:

3   Q.   I'm asking if he has a new opinion

4   regarding testing that has been ongoing in the case,

5   which I think I'm entitled to ask.

6   MR. ZIMMERMAN: Do you have a question

7   about Ms. Stubblefield?   Because it's a case-specific

8   deposition that we're taking today.

9   If you are asking for an update on the

10   opinions that were elicited during his general

11   deposition, it's outside of the scope of this

12   deposition.

13   BY MR. SNOWDEN:

14   Q.   I don't agree.   It's part -- okay.

15   Let me ask it this way.

16   Dr. Iakovlev, for any of the cases in

17   Wave 1 have you performed -- have you concluded your

18   degradation -- strike that.

19   For Ms. Stubblefield or any other cases

20   involving Wave 1 plaintiffs, have you completed your

21   experiment where you were attempting to intentionally

22   oxidize polypropylene to see if it would take up

23   histologic dyes?

24   A.   That experiment was not required to

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1   detect degradation layer for any of these cases. It's

2   done for completely different purpose.

3   Q.   Have you completed it?

4   A.   No, I have not completed it yet.

5   Q.   Do you plan to offer any opinions

6   at trial regarding that experiment?

7   A.   For Ms. Stubblefield?

8   Q.   Yeah, for Ms. Stubblefield.

9   A.   No. For Ms. Stubblefield I will

10   not use it. As I said, it's not required. And it's

11   not needed. I'll do it for different purpose. That

12   experiment is mainly to show that the model of in vitro

13   degradation which can simulate in vivo degradation is

14   usable. It's more of a testing of the model rather

15   than confirming the degradation.

16   Q.   Dr. Iakovlev, on page 13 of your

17   report you have, under the polypropylene degradation

18   section, a paragraph that begins, "In

19   Ms. Stubblefield's case, the mesh also fragmented in

20   the body." Do you see that?

21   A.   I do.

22   Q.   What's your opinion regarding when

23   the mesh fragmented within her body?

24   A.   So if we go back to the

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 1                    REPORTER'S CERTIFICATE

 2              I, TERRY WOOD, RPR, CSR, Certified

 3    Shorthand Reporter, certify;

 4              That the foregoing proceedings were

 5    taken before me at the time and place therein set

 6    forth, at which time the witness was put under oath by

 7    me;

 8              That the testimony of the witness and

 9    all objections made at the time of the examination were

10    recorded stenographically by me and were thereafter

11    transcribed;

12              That the foregoing is a true and correct

13    transcript of my shorthand notes so taken.

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16              _____

17              PER: TERRY WOOD, RPR, CSR

18              REAL-TIME REPORTER

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